

MARIE-ANN GREENBERG, MAG-1284  
MARIE-ANN GREENBERG, STANDING TRUSTEE  
30 TWO BRIDGES ROAD, SUITE 330  
FAIRFIELD, NJ 07004  
(973) 227-2840  
Chapter 13 Standing Trustee

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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

IN RE:  
Madelyn Graffia

Case No. 10-50203 TBA  
**SUPPLEMENTAL CERTIFICATION IN  
SUPPORT OF TRUSTEE'S MOTION  
TO DISMISS & APPLICATION TO  
CONVERT CASE TO CHAPTER 7**

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I, Lauren O'Shea, being of full age certify that:

1. I am a motion specialist for Marie-Ann Greenberg, Chapter 13 Standing Trustee, and I am familiar with the facts of this case.

2. On 3/22/2011, an Order Confirming the Plan was entered by the Court. Said Order ordered debtor to pay the Trustee \$425 for 60 months and general unsecured creditors are to receive a pro rata distribution of these payments [POT plan]. It is also ordered that any non-exempt proceeds from the father's estate would be contributed into the plan for the benefit of the unsecured creditors.

3. On April 3, 2014 the debtor defaulted with plan payments and the Trustee filed a Motion to Dismiss the case. In addition, the Trustee indicated that to date, we had received no status of the inheritance. At the time of filing, the inheritance was pending through litigation and is an asset of the Bankruptcy Estate. Upon information and belief, the Trustee has learned that said suit was settled and the father's Estate has since been disbursed to the Debtor without the Court's approval.

4. As any non-exempt proceeds belong to the general unsecured creditors, the Bankruptcy Estate has been harmed. It is this reason and any other reasons the Court deems fit, that the Trustee recommends the case be converted to Chapter 7.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: May 16, 2014

/s/ Lauren O'Shea  
Lauren O'Shea  
Motion Specialist